



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CNC  
F. #2013R00948

*610 Federal Plaza  
Central Islip, New York 11722*

March 11, 2014

**By Hand and ECF**

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Re: United States v. Philip Kenner & Tommy C. Constantine  
Criminal Docket No. 13-607(JFB)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014 and March 6, 2014. The government renews its request for reciprocal discovery.

Enclosed herein please find the following:

- (1) One (1) DVD containing copies of documents recovered during the execution of a search warrant at defendant Philip Kenner's home in Scottsdale, Arizona on November 13, 2013. The documents are bates-numbered PKHome 1-14,523.
- (2) One (1) CD containing documents provided by the following entities: (a) AXA Equitable (bates-numbered AXA 1-15); (b) Silicon Valley Bank (bates-numbered BNK-SV 1-842); (c) Blue Cross (bates-numbered BlueX 1-43); (d) Merrill Lynch (bates-numbered ML 1-1513); and (e) Smith Barney (bates-numbered SB

1-79). In addition, the CD contains copies of email messages sent and/or received by Kenner.

The government will continue to provide discovery. Please do not hesitate to contact me if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/Carrie N. Capwell  
Carrie N. Capwell  
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Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)